

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Court
Southern District of Texas
FILED

DEC 20 2010

UNITED STATES OF AMERICA

v.

BICH XUAN DANG,
Defendant.

§
§
§
§

CRIM. No.

David J. Bradley, Clerk of Court

10 CR 888

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Possession with Intent to Distribute a Controlled Substance)

On or about December 7, 2009, in the Southern District of Texas,

BICH XUAN DANG,

defendant herein, unlawfully, knowingly, and intentionally possessed with intent to distribute a controlled substance. This violation involved 100 or more marijuana plants. Marijuana is a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(vii).

COUNT TWO

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime)

On or about December 7, 2009, in the Southern District of Texas,

BICH XUAN DANG,

defendant herein, knowingly possessed a firearm, that is, a Glock model 19, 9mm

pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, the offense described in Count One hereof.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT THREE
(Felon in Possession of a Firearm)

On or about December 7, 2009, in the Southern District of Texas,

BICH XUAN DANG,

the defendant herein, having been convicted previously of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce a firearm, that is, a Glock model 19, 9mm pistol, an additional high capacity magazine, and approximately 6 live rounds of assorted ammunition, which had been shipped in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF CRIMINAL FORFEITURE

Pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c), the United States of America hereby gives notice that all firearms and ammunition involved in or used in the commission of the offense charged in Count One, in violation of Title 18, United States Code, Section 922(g)(1), are subject to forfeiture, including, but not limited to, the

following:

– a Glock model 19, 9mm pistol, an additional high capacity magazine, and approximately 6 live rounds of assorted ammunition.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

FOREPERSON OF THE GRAND JURY

JOSE ANGEL MORENO
United States Attorney

By:

A handwritten signature in black ink, appearing to read 'M. B. Kusin', is written over a horizontal line.

MICHAEL B. KUSIN
Assistant United States Attorney